

STATE OF TENNESSEE

Office of the Attorney General



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Reply to:  
Consumer Advocate and Protection Division  
Post Office Box 20207  
Nashville, TN 37202

March 26, 2003

Honorable Sara Kyle  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**RE: In Re: Petition of Tennessee American Water Company to Change and Increase Certain Rates and Charges So As to Permit it to Earn a Fair and Adequate Rate of Return on Its Property Used and Useful in Furnishing Water Service to Its Customers**  
**Docket No. 03-00118**

Dear Chairman Kyle:

Enclosed is an original and thirteen copies of the Consumer Advocate & Protection Division's First Set of Interrogatories and Requests to Produce in the above-referenced matter. Kindly file same in this docket. Copies are being sent to all parties of record. If you have any questions, kindly contact me at (615) 532-3382. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Shilina B. Chatterjee".

Shilina B. Chatterjee  
Assistant Attorney General

Enclosures

cc: All Interested Parties

61904

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

|  |   |                            |
|--|---|----------------------------|
| <b>PETITION OF TENNESSEE</b>           | ) |                            |
| <b>AMERICAN WATER COMPANY TO</b>       | ) |                            |
| <b>CHANGE AND INCREASE CERTAIN</b>     | ) | <b>DOCKET NO. 03-00118</b> |
| <b>RATES AND CHARGES SO AS TO</b>      | ) |                            |
| <b>PERMIT IT TO EARN A FAIR AND</b>    | ) |                            |
| <b>ADEQUATE RATE OF RETURN ON</b>      | ) |                            |
| <b>ITS PROPERTY USED AND USEFUL IN</b> | ) |                            |
| <b>FURNISHING WATER SERVICE TO</b>     | ) |                            |
| <b>ITS CUSTOMERS</b>                   | ) |                            |

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**CONSUMER ADVOCATE & PROTECTION DIVISION'S FIRST SET OF  
INTERROGATORIES AND REQUESTS TO PRODUCE**

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To: Tennessee-American Water Company  
c/o T.G. Pappas, Esq.  
Bass, Berry & Sims, PLC  
2700 First American Center  
Nashville, Tennessee 37238-2700

The Interrogatories are hereby served upon Tennessee-American Water Company ("Tennessee-American"), pursuant to Rules 26, 33 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg 1220-1-2-.11. We request that full and complete responses be provided, under oath, pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate & Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o Vance L. Broemel and Shilina B. Chatterjee, by April 16, 2003.

## PRELIMINARY MATTERS AND DEFINITIONS

Each Interrogatory and Request to Produce calls for all knowledge, information and material available to Tennessee-American, as a party, whether it be Tennessee-American's, in particular, or knowledge, information or material possessed or available to Tennessee-American's attorney or other representative.

These Interrogatories and Requests to Produce are to be considered continuing in nature, and are to be supplemented from time to time as information is received by Tennessee-American which would make a prior response inaccurate, incomplete, or incorrect. In addition, the Attorney General requests that Tennessee-American supplement responses hereto with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert at hearing, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

For purposes of these Interrogatories and Requests to Produce, the term "you" shall mean and include: Tennessee-American Water Company, American Water Works Company, Inc. and American Water Works Service Company ("AWWS") and RWE Aktiengesellschaft ("RWE") and all employees, agents and representatives thereof.

The term "person" or "persons" as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served, all responses must include the company's response. Moreover, the company's designated person for responding must assure that the company provides complete answers. *A complete answer must provide a response which includes all matters known or reasonably available to the company.*

The term "identity" and "identify" as used herein, with respect to any person, means to provide their name, date of birth, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the nature of the document, and the title (if any) of the document.

The term "document" as used herein, means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, photograph, tape recording, computer disk or record, or other data compilation in any form without limitation. Produce the original and each copy, regardless of origin or location, of any book, pamphlet, periodical, letter, note, report, memorandum (including memoranda, note or report of a meeting or conversation), spreadsheet, photograph, videotape, audio tape, computer disk, e-mail, or any other written, typed, reported, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody, or control. If any such document or thing was, but no longer is, in your possession or control, state what disposition was made of it and when.

If you produce documents in response to these Interrogatories, produce the original of each document or, in the alternative, identify the location of the original document. If the "original" document is itself a copy, that copy should be produced as the original.

If any objections are raised on the basis of privilege or immunity, include in your response, a complete explanation concerning the privilege asserted.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any of the interrogatories are not answered on the basis of privilege or immunity, include in your response to each such interrogatory a written statement evidencing:

- (a) the nature of the communication;
- (b) the date of the communication;
- (c) the identity of the persons present at such communication; and
- (d) a brief description of the communication sufficient to allow the Court to rule on a motion to compel.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If any information requested is not furnished as requested, state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

If a document exists in different versions, including any dissimilar copies (such as a duplicate with handwritten notes on one copy), each version shall be treated as a different document and each

must be identified and produced.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. To assist you in providing full and complete discovery, Petitioner provides the following definitional guidelines.

The terms "and" and "or" shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

The term "communication" means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

## **FIRST DISCOVERY REQUEST**

### **INTERROGATORIES AND REQUESTS TO PRODUCE**

#### **GENERAL**

1. Provide a comprehensive discussion of all abnormal conditions or changes in conditions that occurred between January 1, 1997, and the present, such as changes in accounting treatment, etc. Your discussion should include, but not be limited to:
  - (a) Management changes;
  - (b) Operational changes;
  - (c) Administrative changes;
  - (d) Changes resulting from acquisition by RWE; relationship between AWWC and RWE;
  - (e) Any changes in sales volumes;
  - (f) Labor contracts;
  - (g) Pending negotiations for any major change in sales volumes to any current or prospective commercial or industrial customer; and
  - (h) Pending litigation.

2. Provide a current chart of accounts.
3. Provide a current organizational chart for Tennessee-American Water Company, AWWC and RWE, showing Company officers and other key personnel, the departments they head, and to whom they report, from department level or office up.
4. Provide copies of annual stockholder reports of AWWC and RWE for the years 1997 through 2002. Also, provide the 10K reports for 2001, and the 10Q's for each quarter of 2002.
5. Provide a copy of the monthly ledger at July 31, 2002.
6. Provide copies of any Rate Orders issued by other states in which American Water Works Service Company, Southern Division has operated since January 1, 1997.
7. Provide income statements and balance sheets for the 12 months ending July 31, 2002, for Tennessee-American Water Company, American Water Works Company, Inc., and American Water Works Service Company.
8. Provide the calculations of the attrition period expense of the contract between Tennessee-American Water Company and American Water Works Service Company.
9. Provide the number of customers that American Water Works Company, Inc., has by showing a breakdown by state, by month, by revenue class, by year beginning July 31, 1997 and going through July 31, 2002.
10. Provide Utility Plant in Service that American Water Works Company, Inc. has by showing the breakdown by state as of July 31, 2002.

## **REVENUE**

11. Provide a detailed summary of sales by class of service, including sales to other utility

districts for the twelve months ending July 31 for years 1995 through 2002. Detail should include revenue, number of customers, and ccf billed by month and by year; for industrial and "other" sales include detail by named customer.

12. Provide sales variance analyses; i.e., comparison of forecast vs. actual customers, volumes, and revenues for the same period requested in #11 above. Provide any strategic plans/forecasts or correspondence presented by or to Senior Management dealing with these forecasted periods.
13. Provide a detailed forecast of sales by class of service including sales to other utility districts for 2003, 2004, and 2005. As in #11 above, the detail should include revenue, number of customers and ccf forecast by month and by year. Include customer names for the largest 25 industrial and "other" sales customers. Provide any forecasts or plans presented to Senior Management dealing with these forecasts. Provide any correspondence with these companies as to their anticipated usage in these periods.
14. Provide the parameters or trends used to forecast sales (in #13 above) and revenues by class of service.
15. Provide the name and current status of any industrial parks redevelopment (by name) developed since 1997 detailing additional customers served, including sales volumes and revenue by class of service by month, by year. Identify any incorporation of parks, customers, volumes or revenues included in the forecast for the years 2003 through 2005 in #13 above.
16. Provide a copy of all work papers and calculations supporting all adjustments and projections of revenues under present and proposed rates. Include a computer compact disk in Microsoft Excel 97 format for all computer-based calculations.
17. Provide a "hardcopy" along with a computer compact disc (Excel 97 format) detailing all observations used in the development of the weather normalization regression analysis model. The "hardcopy - paper" copy should include all necessary information for operating the model. Data utilized in the model should be properly sourced and identified.
18. Link the output of the model to the "normalized" data incorporated in the adjustments



used in the rate filing.

19. Provide additional details explaining how "normal" can be developed: "this can be accomplished by building statistical models that predict water utilization from meteorological data and other possible predictors."

(a) The comment is made that: "... one is the year itself. Due to gradual introduction of water-conserving plumbing fixtures and appliances, use of water appears to be gradually declining over time." Explain precisely how this statement was incorporated in your statistical analysis; i.e., detail statistics used relating to Tennessee consumers.

(b) Explain your comment, "An estimate of future utilization can then be made by using a long-term average of meteorological data (since there is no better way to forecast next year's weather than as an average)." Explain what "long-term" means; i.e., how many years were used in your analysis? Cite studies properly sustaining this practice.

## **EXPENSES**

20. Provide Operating & Maintenance budgets by month, by account, by year from 1997 through 2002 as approved by Senior Management. Detail should include employee levels as well as payroll expense.
21. Provide variance analysis (actual vs. budget) for the Operating & Maintenance budgets above as reported to Senior Management for the same period as #20 (above).
22. Provide a schedule of employees for the 12 months ended July 31, 2002, identifying them as part or full time, and the account to which their compensation is charged. Identify the regular, overtime and total hours worked during the test period. Also, identify the regular and total earnings during the test period. For those employees working only a partial year, give dates of employment. Identify pay rates at July 31, 2002, and the projected amount and date of raises through the attrition year. Where appropriate, show the allocation of compensation between states and non-regulated operations. Also indicate any anticipated changes in employment levels during 2003 - 2005. Also, provide a copy of the latest union contract between the Company and its union(s).

23. Provide a schedule showing by month, from January 1997 through December 2002, the amount and the percentage of total payroll capitalized on a total Company and Tennessee only basis.
24. Provide a description of each type of service that employees of American Water Works Company/RWE perform for Tennessee-American Water Company operations.
25. Provide detailed work papers supporting the calculation of the Life Insurance Expense, Long-Term Disability, and Hospitalization expenses. For the attrition period, show the total and capitalized amount.
26. Provide an insurance schedule for the 12 months ended July 31, 2002, identifying the policies in effect, the type of coverage, the coverage period, the annual premiums, the amount included as an expense, the account charged, the beneficiaries, and the allocation used. Also, provide the above information for those policies currently in effect and any anticipated changes in policies for the years 2003 and 2004.
27. Provide a detailed analysis of advertising expense for the 12 months ended July 31, 2002. Provide and discuss the Company's projected advertising expense for the remainder of the years 2002 and 2003. Identify for the test period and attrition period, the amount of advertising classified as follows:
  - (a) Institutional;
  - (b) Conservation;
  - (c) Promotional; and
  - (d) Informational.
28. Provide any and all variance analyses or plans (not provided previously) provided to Senior Management explaining how to meet earnings objectives for Tennessee- American Water Works by year from 1997 through 2002. The discussion may include reduction in O&M Expense, additional sales opportunities, etc. Submit any communications and/ correspondence with "outside" companies or municipalities.
29. Detail the accounting treatment for the costs incurred by Tennessee-American related to defending its eminent domain case with the City of Chattanooga. Provide the detail of expenses incurred relating to this issue, including expense by account along with a

narrative explaining its purpose. If posted to a deferred account, explain in detail the accounting treatment.

30. Provide the following items concerning the rental of any equipment or other property:
  - (a) Lease agreements; and
  - (b) Amount of expense for 2003 and 2004.
31. Explain how these "eminent domain mitigation" costs (in #29 above) were/will be recovered including transactions posted, accounts, amounts, and dates.
32. Provide a copy of the Company's cost allocation study.
33. Explain the calculation and provide work papers concerning the Company's growth factor.
34. Provide a listing of all known expenses increases and/or decreases which will occur during 2003 and 2004. Show the nature of the change, the effective date of the change, the effect on operating expenses and the effect on net operating income.
35. Provide the following related to pension expense:
  - (a) The actuarial rate at July 31, 2002;
  - (b) Capitalization policies and percentages for pensions;
  - (c) Ratio of pension expense to salaries and wages charged to operations and maintenance for each month from August 2001 through July 2002; and
  - (d) A copy of the latest actuarial report issued for Tennessee-American Water Company.
36. Provide the following information relating to management fees:
  - (a) An income statement and balance sheet for American Water Works Service Company for the 12 months ended July 31, 2001, and July 31, 2002;
  - (b) Copies of monthly billing statements from American Water Works Service Company to Tennessee-American for management fees for the period August 1, 2001, to

July 31, 2002;

(c) A breakdown of management fees paid by Tennessee-American for the 12 months ended July 31, 2001, and July 31, 2002;

(d) A written description of the method used to allocate Management Fees. Provide a description of each type of service that employees of American Water Works Company perform for Tennessee-American for the same period in "(c)" above; and

(e) Working papers showing the parent company's expense, the allocation factors, and the basis used to allocate each expense to Tennessee-American for the same period in "(c)" above.

## TAXES

37. Provide copies of the following tax returns or tax statements:

(a) Tennessee Gross Receipts tax returns for 2000-01, 2001-02;

(b) Tennessee Franchise and Excise tax returns for 2000, 2001, and 2002;

(c) Property tax statements for 2000, 2001 and 2002;

(d) Employer's Quarterly Federal Tax Returns (Form 941), for each quarter of 2001 and 2002;

(e) Employer's Annual Federal Unemployment Tax Return (Forms 940) for 2001 and 2002; and

(f) Employer's Quarterly Contribution Report to the Tennessee Department of Employment Security for each quarter of 2000, 2001, and 2002.

38. Provide the following Federal Income Tax data for Tennessee operations for the 12 months ended July 31, 2001 and 2002:

(a) Operating federal income taxes deferred-accelerated depreciation;

(b) Federal income taxes-operating;

(c) Income credits resulting from prior deferrals of federal income taxes; and

(d) The amount of Investment Tax Credits realized and the amount amortized split between Pre-1971 and Post-1970.

39. Provide a reconciliation of book to taxable income and a calculation of the federal income tax expense on a total company and Tennessee only basis for the 12 months ended July 31, 2002.

## **RATE BASE (Excluding Working Capital)**

40. Provide capital budget forecasts from 1995 through 2002 including any variance analysis performed on a monthly/quarterly/annual basis during that period comparing actual vs. forecast on a total company and Tennessee only basis.
41. As a subset of #44 below, include capital budget allocations from 1995 through 2002 for fire hydrant relocation costs along with variance analysis on an annual basis.
42. Provide all costs forecast detail in the settlement agreement with the City of Chattanooga for the years 1999 - 2000 agreed to improve Chattanooga's fire rating. These should include capital and O&M expense detail.
43. Provide cost of service comparison for fire hydrants between the current case and the case in TRA Docket 96-00959.
44. Provide by account number for the 12 months ended July 31, 1997, 1998, 1999, 2000, 2001, 2002, plant additions and retirements. Provide the break down for plant additions into normal or special projects defined as follows:

Normal construction requirements should be considered to include the needs created through normal system expansion such as service residential areas, shopping areas, old home conversions, replacements of tools and work equipment, transportation equipment, etc.;

Special construction requirements should be considered to arise from extensive replacement of old facilities which cannot be foreseen, major expansion projects such as industrial parks, system improvements such as change from low pressure to high pressure required because of changing delivery patterns, and changes required by governmental action such as street improvements and relocations, community and neighborhood development, bridge replacements, etc. These requirements should be considered to be outside the control of the Company.
45. Identify by account for the 12 months ended July 31, 1997, 1998, 1999, 2000, 2001 and 2002, the salvage and cost of removal for retirements.

46. Break down 2003 and 2004 budgeted plant additions between normal and special project using the criteria defined in Item 44 above. Provide sufficient details of individual projects as to date of inception and completion, and methods of financing.
47. Identify all special projects for 2000, 2001, and 2002 using the criteria defined in Item 46 above by work order number and estimated cost. Provide a signed authorization for each special project and identify the planned starting and completion dates.
48. For the 12 months ended July 31, 1997, 1998, 1999, 2000, 2001 and 2002, identify any contributions in aid of construction resulting from special projects.
49. Provide a description of Company policy with respect to maintaining minimum cash balances, and lenders' requirements for compensating balances.
50. Provide comparison of the lead-lag study used in this case with the study used in the previous case and explain any major changes.
51. Provide schedules showing the development of the average Tennessee account balances listed below for each month of August 2001 through July 2002:
  - (a) Water plant in service;
  - (b) Construction work in progress;
  - (c) Inventories;
  - (d) Deferred debits;
  - (e) Reserves;
  - (f) Customer Deposits;
  - (g) Contributions in aid of construction;
  - (h) Pre-1971 Unamortized Investment Tax Credit;
  - (i) Accumulated Deferred FIT;
  - (j) Accumulated Depreciation;
  - (k) Accounts payable applicable to CWIP;
  - (l) Accounts payable applicable to Materials & Supplies; and
  - (m) Customer Advances.
52. Describe the Company's capital budgeting process including, but not limited to the following:

- a. How far in advance are operating and construction budgets prepared;
- b. How many views or updates of the same budget year are made before a final view is adopted;
- c. Are budgets prepared on a monthly, quarterly, or annual basis;
- d. Which individual or department has overall responsibility for budget preparation; and
- e. Once a final budget has been adopted, are budget to actual comparisons (variance analyses) routinely made on a monthly or annual basis?

## **COST OF CAPITAL AND COST OF SERVICE**

52. Regarding Schedule PRM-2 pages 1 and 2, the line titled "Long-Term Debt," provide the requested information on the bonds and notes which are the source of the 50.2% ratio shown in the schedule and provide the information on a diskette or CD that can be read in ASCII or Excel:
- (a) the face amount of each long-term debt note;
  - (b) the date the note was issued;
  - (c) the date the note is scheduled to mature;
  - (d) the note's interest rate payable to the note holder;
  - (e) the number of payments made each year to the note holder(s);
  - (f) the earliest date the note can be called in by the company for early redemption;
  - (g) the unamortized balances and monthly amortizations, if any, on the gain or loss in reacquired if any, on reacquired long-term debt;
  - (h) the amount of the company must pay to noteholders in the event of early redemption;
  - (i) the amount rolled into the note for early redemption of notes that have already been retired;
  - (j) the book value of the assets pledged against the note;
  - (k) the name and business address of the company or person(s) who own the assets;
  - (l) the minimum equity ratio, TIER ratio, and any other term or condition which must be met to comply with the note's covenants; and
  - (m) indicate if the note is Senior or subordinated debt.
53. Provide the capital structure of Tennessee-American's parent company, American Water Works, as of July 31, 2002.

54. Provide the capital structure of Tennessee-American's parent company, RWE, for the attrition year.
55. Regarding Schedule PRM-2 pages 1 and 2, the line titled "Common Equity," provide the amount of dividends paid by Tennessee-American, as a percentage of Tennessee-American's earnings, to its parent return for the years ending December 31, 1997, through December 31, 2002.
56. Provide the dollar amount of dividends, as a percentage of Tennessee-American's earnings, paid or expected to be paid by Tennessee-American to its parent in the attrition year.
57. Regarding Schedule PRM-2 pages 1 and 2, the line titled "Common Equity," provide the amount of capital paid from American Water Works to Tennessee-American for the years ending December 31, 1997 through December 31, 2002 and indicate if the parent purchased any new issues of Tennessee-American's common stock.
58. Provide the amount capital paid or expected to be paid in by RWE to Tennessee-American in the attrition year and indicate if the parent is expected to purchase any new issues of Tennessee-American's common stock.
59. Regarding Dr. Moul's Direct Testimony, page 32 lines 1-13, provide a history of Blue Chip forecasts starting in 1998: For example, what were Blue Chip's forecasts in the 1st quarter of 1998 for the various interest costs in the first quarter of 1999?
60. Provide an electronic copy of the Value Line Investment Survey for Windows referred to Dr. Moul's direct testimony at page 40, line 19. Provide a copy of the record and field layout of the data base. Provide the data in a format that can be read by Microsoft Excel or in ASCII form.
61. Provide a copy of the Rates Manual of the American Water Works Association for the year 2000 referenced by Mr. Herbert at page 4, line 21 of his direct testimony.



62. Provide a description of any statistical sampling procedures used to develop the allocation factors in the cost of service allocation study compiled in Schedule C referred to by Mr. Herbert. Indicate the number of sampling meters for each customer class, the length of time taken to develop the statistical sample, frequency with which the sampling meters are read, and any tests of statistical significance.
63. For the 12 month period ending July 31, 2002, regarding each customer class shown in Schedule C, identify by date the day of maximum usage for each customer class and the volume of that usage.
64. For the 12 month period ending July 31, 2002, identify by date the day of maximum usage for Tennessee-American as a whole, the volume of that usage, and the contribution of each customer class to that day's usage.
65. For the 12 month period ending July 31, 2002, regarding each customer class shown in Schedule C, identify by date the hour of maximum usage for each customer class and the volume of that usage.
66. For the 12 month period ending July 31, 2002, identify by date the hour of maximum usage for Tennessee-American as a whole, the volume of that hour's usage, and the contribution of each customer class to that usage.
67. For the 12 month period ending July 31, 2002, identify the percentage of Tennessee-American's maximum daily capacity supplied on the date of maximum daily usage.
68. For the 12 month period ending July 31, 2002, identify the percentage of Tennessee-American's maximum hourly capacity supplied on the date of maximum hourly usage.
69. For each month of the 12 month period ending July 31, 2002, provide for each customer class the number of estimated bills rendered and the number of bills issued.

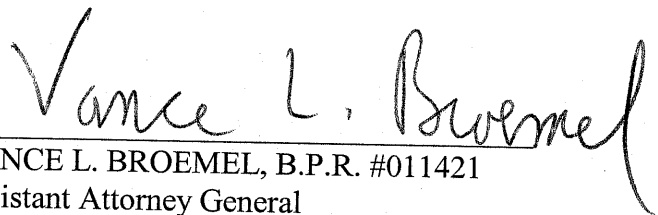
70. For each year ending Dec. 31, 1997 through 2002, provide for each customer class the number of estimated bills rendered and the number of bills issued.
71. Explain how the reduction in the monthly price of Fire Hydrant service from \$301.50 to \$50 in the year 2000 affected Tennessee American's expenses and revenues in the test year and the attrition year.
72. Regarding Tennessee American's "Other Deferred Debits" of \$1,521,988, provide documentation, including all workpapers, which support the exhibit.
73. Provide a copy of the management audit referenced in the "Other Deferred Debits" exhibit.

\_\_\_\_\_  
Name of person answering these questions

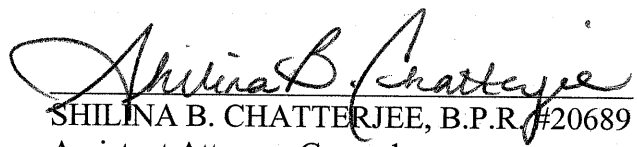
\_\_\_\_\_  
Title of person answering these questions.

\_\_\_\_\_  
Signature of person answering these questions

RESPECTFULLY SUBMITTED,



VANCE L. BROEMEL, B.P.R. #011421  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
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SHILINA B. CHATTERJEE, B.P.R. #20689

Assistant Attorney General

State of Tennessee

Office of the Attorney General

Consumer Advocate and Protection Division

P.O. Box 20207

Nashville, Tennessee 37202

(615) 532-3382

Dated: March 26, 2003

## CERTIFICATE OF SERVICE

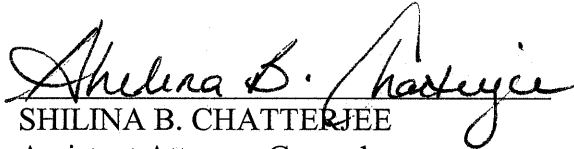
I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail and/or facsimile on March 26, 2003.

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